

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VALENTIA VILLETTI and FAIZA JIBRIL, M.D., Case No.: 1:18-cv-10200-MKV-KNF

Plaintiffs,

- against -

GUIDEPOINT GLOBAL, LLC,

Defendant.

**DECLARATION IN SUPPORT
OF DEFENDANT’S MOTION
FOR SUMMARY JUDGMENT**

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David J. Grech declares under penalty of perjury that the following is true and correct:

1. I am a partner with the law firm of Gordon Rees Scully Mansukhani, LLP, attorneys of record for defendant Guidepoint Global, LLC (“Guidepoint”) in this case. I submit this declaration in support of Guidepoint’s motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. This declaration is based upon my review of the records of this case maintained by my office.

2. Annexed hereto as Exhibits “A” to “P” are true and accurate copies of documents exchanged during the course of discovery in this action and transcripts from the testimonies of the depositions of the parties taken in this action, which are relied upon and cited in Guidepoint’s Local Civil Rule 56.1 Statement of Material Facts and Guidepoint’s Memorandum of Law, both of which are submitted herewith in support of Guidepoint’s motion for summary judgment. These documents and transcripts are as follows:

A. Complaint of plaintiffs Valentia Villetti (“Villetti”) and Faiza Jibril (“Jibril”) (collectively, “Plaintiffs”), dated November 5, 2018, is annexed hereto as Exhibit “A.”

B. Villetti's Offer Letter is annexed hereto as Exhibit "B."

C. Villetti's Termination Letter is annexed hereto as Exhibit "C."

D. Transcript of Villetti's Deposition Testimony, taken on October 1, 2019, is annexed hereto as Exhibit "D."

E. Transcript of Villetti's Deposition Testimony, taken on November 14, 2019, is annexed hereto as Exhibit "E."

F. March 2018 Email from Albert Sebag to Villetti is annexed hereto as Exhibit "F."

G. Email from Jessica Kagan-Tropea ("Kagan") to Bouker Pool ("Pool") is annexed hereto as Exhibit "G" identified as Exhibit "N" during Villetti's November 14, 2019 deposition.

H. Email from Kagan to Priscilla Gulino ("Gulino") is annexed hereto as Exhibit "H" identified as Exhibit "O" during Villetti's November 14, 2019 deposition.

I. March 12, 2018 email from Villetti to Gulino is annexed hereto as Exhibit "I."

J. Pool's Email to Human Resources is annexed hereto as Exhibit "J" identified as Exhibit L during Villetti's November 14, 2019 deposition.

K. Plaintiffs' Response to Guidepoint's Requests to Admit is annexed hereto as Exhibit "K."

L. Transcript of Jibril's Deposition Testimony, taken on October 3, 2019 is annexed hereto as Exhibit "L."

M. Guidepoint's First Requests to Plaintiffs for Production of Documents is annexed hereto as Exhibit "M."

N. Plaintiffs' Responses to Defendant's First Requests for Production of Documents is annexed hereto as Exhibit "N."

O. Guidepoint's Employee Handbook is annexed hereto as Exhibit "O."

P. Villetti's Acknowledgement of the Employee Handbook is annexed hereto as Exhibit "P."

Dated: New York, New York
September 14, 2020

GORDON REES SCULLY MANSUKHANI, LLP

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